

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

**RACHEL RAMSBOTTOM,**  
**ALEXIS BOWLING,**  
**JENNA HOUSTON,**  
**JANE DOE #1,**  
**Plaintiffs,**

**v.**

**LORIN ASHTON,**  
**AMORPHOUS MUSIC, INC.,**  
**BASSNECTAR TOURING, INC.,**  
**REDLIGHT MANAGEMENT, INC.,**  
**C3 PRESENTS, L.L.C.,**  
**INTERACTIVE GIVING FUND,**  
**GNARLOS INDUSTRIES, LLC,**  
**CARLOS DONOHUE, ABC**  
**CORPORATIONS, ONE THROUGH**  
**TEN (said Names Being Fictitious),**  
**JOHN DOES, ONE THROUGH TEN**  
**(said Names Being Fictitious),**  
**Defendants.**

**No. 3:21-cv-00272**

**Jury Trial Demanded**

**District Judge Aleta A. Trauger**

**DEFENDANT CARLOS DONOHUE’S  
MOTION TO DISMISS PLAINTIFFS’ FIRST AMENDED COMPLAINT**

Defendant Carlos Donohue, by and through undersigned counsel, respectfully moves this Court to dismiss Plaintiffs’ First Amended Complaint (“FAC”) against him with prejudice pursuant to: (i) Federal Rule of Civil Procedure 12(b)(2) because this Court lacks personal jurisdiction over Carlos Donohue; (ii) Federal Rule of Civil Procedure 12(b)(3) because venue in this Court is improper; and (iii) Federal Rule of Civil Procedure 12(b)(6) because Plaintiffs have failed to state a claim against Mr. Donohue upon which relief can be granted.

For the foregoing reasons and for the reasons set forth in the Memorandum in Support filed contemporaneously herewith, Mr. Donohue respectfully requests this Court dismiss Plaintiffs’

FAC against him with prejudice and for such other general relief as deemed appropriate by this Court, including costs and fees.

Respectfully submitted,

**Sherwood Boutique Litigation, PLC**

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was filed with the Court's electronic filing system and thereby sent via email to the following:

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on this the 30th day of August, 2021.

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